#### STATE OF ILLINOIS

#### **ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission
On Its Own Motion

Investigation concerning Illinois Bell Telephone Company's compliance with Section 271 of the Telecommunications Act of 1996. 01-0662

OFFICIAL FILE

I.C.C. DOCKET NO. OL-OGO 2. O. Witness Duter

Date 1102 Reporter KM

#### **PUBLIC VERSION**

DIRECT TESTIMONY OF A. EARL HURTER

ON BEHALF OF

WORLDCOM, INC.

WORLDCOM EX. 2.0

March 20, 2002

2	Q.	PLEASE STATE YOUR NAME, BY WHOM YOU ARE EMPLOYED,
3		YOUR BUSINESS ADDRESS AND YOUR POSITION.
4 5	A.	My name is A. Earl Hurter. I am the Senior Manager for Central Line Cost
6		Management within WorldCom, including the subsidiary companies of MCImetro
7		Access Transmission Services, Inc., and MCI WorldCom Communications, Inc.,
8		referred to in my testimony as "MCI" or "WorldCom".
9		
10		
10		
11	Q.	BRIEFLY STATE YOUR EDUCATIONAL BACKGROUND.
12 13	A.	I received my Master of Science degree in Telecommunications and Computer
14		Science from DePaul University, Chicago, in 1993 and graduated Suma Cum
15		Laude. I received by Bachelor of Science degree from Northeastern Illinois
16		University, Chicago, in 1983 and graduated Magna Cum Laude. I also studied
17		Electrical Engineering and Computer Science at Northwestern University,
18		Evanston, IL, from 1978 - 1981
19	Q.	PLEASE STATE YOUR PREVIOUS WORK EXPERIENCE IN THE
	Q.	
20		AREA OF TELECOMMUNICATIONS.
21	A.	I have been employed by WorldCom or its predecessor entities for sixteen years.
22		My experience includes five years in engineering and provisioning, five years in
23		terminal and field operations, and six years in line cost management. My present

I. INTRODUCTION

1

24 title is Senior Manager for Central Region Line Cost Management, where I manage 25 the auditing and payment of telephone company ("telco") invoices from many companies, including Ameritech. I have held this position for three years. 26 27 28 II. PURPOSE 29 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY? 30 31 A. I will discuss certain billing issues with Ameritech relating to situations where WorldCom provides local service via UNE-P. These issues include the topics of 32 -33 local toll billing, Operator Services/Directory Assistance (OS/DA) billing, and Ameritech billing WorldCom for customers who either no longer are, or never have 34 35 been, WorldCom customers. 36 III. DISCUSSION WHAT IS PRESENTLY IMPROPER ABOUT THE WAY IN WHICH 37 Q. AMERITECH BILLS FOR LOCAL TOLL USAGE? 38 39 At a high level, there are four main issues with respect to Ameritech's billing of A. 40 WorldCom for local toll usage. First, Ameritech should not be billing WorldCom 41 for local toll usage. Second, even if there were circumstances in which it would be appropriate for Ameritech to bill WorldCom for local toll usage, the billing 42 format is improper. Local toll usage should be in the CABS format, as opposed to 43 44 the CRIS billing which Ameritech is presently utilizing for local toll usage. Third, 45 the rate that Ameritech is charging WorldCom for local toll usage -- 42.3 cents

47		the jurisdiction of the calls on its CABS billings is entirely improper.
48	Q.	YOU MENTIONED ABOVE THAT AMERITECH SHOULD NOT BE
49		BILLING WORLDCOM FOR LOCAL TOLL USAGE. PLEASE EXPLAIN
50		HOW AMERITECH IS BILLING WORLDCOM FOR THIS USAGE AND
51		WHY IT IS IMPROPER FOR AMERITECH TO BILL WORLDCOM FOR
52		LOCAL TOLL USAGE.
53	A.	From January 2001 until the February 16, 2002 invoice (which is the most
54		recently reviewable invoice as of the time of the filing of this testimony)
55		Ameritech has improperly billed WorldCom in excess of (CLEC-Specific
56		Confidential Information: \$******) for local toll usage. This amount has
57		appeared on UNE-P bills received from Ameritech for both Illinois and Michigan.
58		
59		Where WorldCom provides local service via UNE-P, a large volume of local toll
60		calls are being routed over the Ameritech network and Ameritech is billing
61		WorldCom for these calls at a very high per-minute rate regardless of who the
62		presubscribed carrier for the customer is for these calls. It is believed that in most
63		cases, the local toll PIC is WorldCom, but we have been billed for local toll usage
64		when another interexchange carrier (IXC) or Ameritech is the local toll PIC.
65		WorldCom has also been billed for local toll usage for customers who have not
66		selected a carrier for local toll calls.
67		

per minute -- is entirely improper. And finally, the way in which Ameritech lists

46

The "Miscellaneous" part of the bill has a charge type defined as local toll. This is identified with a USOC/Charge Type of 919211 as set forth on the bill. (Schedule EH-1, pages 4 and 6). (A USOC (universal service order code) allows for the separate identification of the various billing elements and their respective rates. Customers who are presubscribed to WorldCom for local toll should have their local toll calls routed directly to the WorldCom long distance switch and Ameritech should not be billing WorldCom usage for these calls. Yet, Ameritech is billing WorldCom usage for local toll calls as evidenced by Schedule EH-1.

# Q. HOW DID YOU FIRST DISCOVER THAT AMERITECH WAS BILLING WORLDCOM FOR LOCAL TOLL USAGE?

- 90 A. We discovered these usage charges after conducting an investigation of the DUF
  91 records we received from Ameritech. The DUF records showed that we-were
  92 receiving so-called Category 10 records. A Category 10 record indicates a local
  93 toll call. We then conducted an investigation of the monthly bills, resulting in the
  94 discovery of the "Misc." category on the CRIS bill. Included in the "Misc."
  95 category was the USOC for local toll calls.
- 96 Q. SHOULD AMERITECH BILL WORLDCOM FOR ANY LOCAL TOLL97 USAGE?
- No. For those customers who have WorldCom for local and Ameritech (or 98 A. 99 another IXC) for local toll, the customer should be billed by Ameritech (or the 100 other IXC) for the local toll calls. Ameritech should not be billing WorldCom for 101 these calls. Yet, Ameritech is billing WorldCom for these calls in the monthly 102 bills such as Schedule EH-1. As explained earlier, we discovered local toll records 103 in the DUF. Comparing the calling party ANI to the presubscribed database 104 revealed that many of the customer's making local toll calls that appeared on the 105 DUF were not WorldCom local toll customers.
- 106 Q. SHOULD WORLDCOM BE BILLED FOR LOCAL TOLL USAGE IF THE

  107 CUSTOMER HAS NOT DESIGNATED A LOCAL TOLL CARRIER?
- 108 A. No. Ameritech should not be billing WorldCom for local toll usage for those
  109 customers who have not designated a presubscribed carrier for local toll.
  110 Ameritech should be blocking these calls instead of processing these calls and
  111 billing WorldCom for these calls. Yet, Ameritech is billing WorldCom for these

112		calls in monthly bills such as Schedule EH-1. The same process as explained
113		above was used to determine if the originating party was presubscribed to WCOM
114		or had a 'no' PIC for local toll calling.
115	Q.	PREVIOUSLY, YOU MENTIONED THAT EVEN IF AMERITECH
116		COULD PROPERLY BILL WORLDCOM FOR LOCAL TOLL USAGE,
117		THAT THE BILLING SHOULD BE IN CABS FORMAT, AS OPPOSED
118		TO THE CRIS FORMAT WHICH AMERITECH IS PRESENTLY
119		SENDING TO WORLDCOM FOR LOCAL TOLL USAGE. PLEASE
120		EXPLAIN.
121	A.	Ameritech has been sending the local toll usage billing to WorldCom in CRIS
122		format, such as set forth in Schedule EH-1. However, Ameritech previously
123		committed to sending all telco billing to WorldCom in CABS format, except for
124		Operator Services and Directory Assistance. Ameritech had committed to
125		implement this type of CABS billing no later than the fourth quarter of 2001, yet
126		it has not done so. (For an example of Ameritech's commitment to implement
127		CABS billing, see Ameritech Accessible Letter CLECAM01-236, dated August
128		14, 2001, which is attached as Schedule EH-2).
129		
130	Q.	YOU PREVIOUSLY MENTIONED THAT AMERITECH IS CHARGING
131		WORLDCOM A RATE OF 42.3 CENTS PER MINUTE FOR LOCAL
132		TOLL USAGE IN ILLINOIS AND THAT THIS IS IMPROPER. PLEASE
133		EXPLAIN.

A.

As set forth above, there should be no charge for these local toll calls. Yet,

Ameritech is billing WorldCom about 42.3 cents per minute in Illinois. (See, the
sixth page of Schedule EH-1 which shows CLEC-Specific Confidential

Information: \$\*\*\*\*\*\*\*\* in charges for \*\*\*\*\*\*\*\*minutes. \$\*\*\*\*\*\*\* divided

by \*\*\*\*\*\*\*\* minutes is 42.3 cents per minute). This issue has been ongoing with a total claim (from 1/1/01 through the bill dated February 16, 2002) of
more than over (CLEC-Specific Confidential Information: \$\*\*\*\*\*\*\*\*) and
is increasing monthly.

# Q. YOU PREVIOUSLY MENTIONED THAT THE WAY IN WHICH AMERITECH LISTS THE JURISDICTION FOR THE CALLS ON ITS CABS BILLING IS ENTIRELY IMPROPER. PLEASE EXPLAIN.

A. The CABS billing is supposed to categorize the jurisdiction of the calls being billed. By "jurisdiction", this means whether the calls being billed are local, local toll, etc. While I explained above that WorldCom should not be billed for any of the local toll calls, the CABS bill which Ameritech is sending to WorldCom has put all of the calls and usage as being local toll (or, in the wording of CABS, "intrastate/intraLATA" calls.) A more specific description is that all CABS usage being billed by Ameritech shows that all usage is for jurisdiction "3" which is supposed to designate intrastate/intraLATA usage, while the Ameritech CABS bill shows zero usage for jurisdiction "5" which is supposed to designate local

156		usage. If the bills were properly issued, there would be no local toll billing in the
157		CABS bills, and all local calls would be in the jurisdiction "5" category.
158		
159	Q.	YOU STATE THAT THE ISSUE HAS BEEN ON-GOING. HOW HAVE
160		YOU BROUGHT THIS ISSUE TO THE ATTENTION OF AMERITECH?
161	A.	I have had several conference calls with Ameritech on these issues. The most
162		recent meetings took place on November 30, 2001, and December 18, 2001. In
163		addition to the conference calls, there have been follow-up requests via email and
164		phone conversations as to the status of the on-going dispute. The most recent
165		status from the Ameritech account team is that their research is on-going.
166		
167		In these meetings, Ameritech has agreed that customers who are presubscribed to
168		WorldCom for local toll or who are not presubscribed to any carrier for local toll
169		should not have their local toll calls billed to WorldCom. Ameritech contends that
170		the category of customers who are not presubscribed to any local toll carrier
171		should represent a small percentage of the total charges appearing in this category
172		of billing.
173		
174		Ameritech continues to research this issue but has denied these claims and insists
175		on collecting on its bills for these items.
176		

Ameritech has also raised a procedural issue, asserting that before it will even consider a dispute on billings of this nature, WorldCom must first present call detail to Ameritech. Call detail in this situation would be the date and time of each call at issue together with the originating and terminating numbers. There is no reason why call detail information would have to be supplied by WorldCom. Ameritech issued the bill and Ameritech should have the call detail to support its bills. Further, considering that the entire *category* of charges is unfounded, providing the call detail would be of little value and frankly makes no sense.

# Q. ARE THERE OTHER SIGNIFICANT PROBLEMS WITH THE MONTHLY CRIS BILL ISSUED BY AMERITECH?

It is apparent that the Ameritech charges for Directory Assistance and Operator Services grossly exceed the tariffed rates in Illinois. The rate for unbundled Directory Assistance calls in Ameritech's Illinois Tariff is \$.258 per call (see, Illinois Bell Tariff, ILL. C. C. No. 20, part 19, Section 7, 1<sup>st</sup> revised Sheet No. 9, attached as Schedule EH-3). The Ameritech Illinois tariffed rate for unbundled

199	WorldCom Ex. 2.0 Hurter Direct PUBLIC VERSION Docket No. 01-0662 Operator Services calls for manual call assistance is \$.364 per call. (See, Illinois
200	Bell Tariff, ILL. C. C. No. 20, part 19, Section 8, 2nd revised Sheet No. 10,
201	attached as Schedule EH-4).
202	
203 <b>Q.</b>	DOES THIS COMPLETE YOUR DIRECT TESTIMONY IN THIS
204	MATTER?
205 <b>A.</b>	Yes.

# WorldCom Ex 2.0 Hurter Direct Investigation Regarding Illinois Bell Section 271 Compliance Docket No. 01-0662

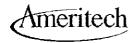
Schedule EH-1 Public Version

### This schedule contains the following:

Examples of invoices from Ameritech Unbundled Services.

This schedule contains a total of nine (9) pages.

# Remittance from



#### **AMERITECH UNBUNDLED SERVICES**

Date: 2/16/02

**Customer Code:** 

Customer #:

Terms:

To: WorldCom

Invoice #: 109695 ~-

205 N. Michigan Ave., Suite 3700

Dept 9467/500 Chicago, IL 60601 Attn: James Devries

Previous Balance:

Payments:

Adjustments:

Late Payment Charge

**Current Invoice:** 

**Due By: 3/18/02** 

**Balance Due:** 

Please remit payment to

Ameritech - RBS P.O. Box 1838

Saginaw, MI 48605-1838

For Billing Questions call: (616) 257-1888

WorldCom Ex. 2.0

Hurter Direct

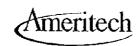
Investigation regarding Illinois Bell Section 271 compliance

Docket No. 01-0662

Schedule EH-1

**PUBLIC VERSION** 

# SUMMARY INVOICE from **AMERITECH UNBUNDLED SERVICES**



Invoice Number: 109695

**Customer Code:** 

To: WorldCom

205 N. Michigan Ave., Suite 3700

Dept 9467/500

Chicago, IL 60601

Attn: James Devries

Customer #:

Invoice Date: 2/16/02

Due Date: 3/18/02

Page 1

#### **CURRENT CHARGES**

### Unbundling

Recurring Charges

Usage - Intraswitch

Non-Recurring Charges

Miscellaneous

**Unbundling TOTAL:** 

## Daily Usage Record Charges

Daily Usage Record Charges

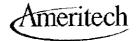
Daily Usage Record Charges TOTAL:

**GRAND TOTAL:** 

WorldCom Ex. 2.0 Hurter Direct Investigation regarding Illinois Bell Section 271 compliance Docket No. 01-0662 Schedule EH-1 **PUBLIC VERSION** 

## **DETAIL INVOICE**

from



### **AMERITECH UNBUNDLED SERVICES**

Invoice Number: 109695

**Customer Code:** 

Customer #:

Invoice Date: 2/16/02

Bill Group: Unbundling

Bill Line: Recurring Charges

Class of Service	USOC/Charge Type	Qty	Current Charges	
PU7	CXC9X			
PU7	NSR			. *
PU7	UJR			
	Bill Line Total:			

Bill Line: Usage - Intraswitch

Class of Service	USOC/Charge Type	Qty	Current Charges	
RES	919305			
BUS	919305	• .		
I	Bill Line Total :			

Bill Line: Non-Recurring Charges

Class of Service	USOC/Charge Type	Qty	Current Charges	
PU7	NR9UU			

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Schedule EH-1 **PUBLIC VERSION** 

#### Bill Line Total:

Bill Line: Miscellaneous

Class of Service	USOC/Charge Type	Qty	Current Charges
BUS	919205		
RES	919205		•
BUS	919206		
RES	919206		
BUS	919211		
RES	919211		
RES	919233		
RES	919305		
RES	919365		
RES	919377		
RES	999380		
RES	999381		
RES	999383		
RES	999384		
RES	999385		
RES	999388		
PU7	ESX		. ⊸. <del>*</del>
PU7	N8D		
PU7	NPU		
PU7	NRSC		
- PU7	UXTBU		

Bill Line Total:

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Bill Group Total :		\$860,417.12		
Bill Group: Daily Usage Record Charges  Bill Line: Daily Usage Record Charges	Usage Record Charges  y Usage Record Charges  Service USOC/Charge Type Qty Current Charges  JRC @DURC  Bill Line Total:  Bill Group Total:			
Class of Service USOC/Charge Type	Qty	Current Charges		
DURC @DURC		· ,		
Bill Group Total :		·		
Invoice 109695 Total		· · · · · · · · · · · · · · · · · · ·		

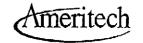
**End of Invoice** 

109695

WorldCom Ex. 2.0
Hurter Direct
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# **AUDIT DETAIL INVOICE**

## from **AMERITECH UNBUNDLED SERVICES**



Invoice Number: 109695

Customer #: 040L027229000

Customer Code: WUAIL

Invoice Date: 2/16/02

Summary Invoice Group: Unbundling

Summary Invoice Line: Recurring Charges

Class of Service	USOC / Call Pack	Qty/ Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
PU7	CXC9X		т .		\$0.00	0		.1	\$0.00	0
PU7	NSR				\$0.00	0			\$0.00	0
PU7	UJR				\$0.00	0			\$0.00	0
Involce Summary Line Total :					\$0.00				\$0.00	0

Summary Invoice Line: Usage - Intraswitch

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
RES	919305	L	•		\$0.00	0	\$0.00	0	\$0.00	0
BUS	919305				\$0.00	0	\$0.00	0	\$0.00	0
Invoice Si	ummary Line	Total:			\$0.00	0	\$0.00	0	\$0.00	0

Summary Invoice Line: Non-Recurring Charges

Class of USOC / Qty / Service Call Pack Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
PU7 NR9UU		•	\$0.00	0	\$0.00	0	_	
Invoice Summary Line			\$0.00	0	\$0.00	0	<b>=</b>	

Summary Invoice Line: Miscellaneous

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
BUS	919205	L	•		\$0.00	0	\$0.00	0	\$0.00	0
RES	919205				\$0.00	0	\$0.00	0	\$0.00	0
BUS	919206	Γ			\$0.00	0	\$0.00	0	\$0.00	0
RES	919206	Γ			\$0.00	0	\$0.00	0	\$0.00	0
BUS	919211				\$0.00	Ö	\$0.00	0	\$0.00	0
RES	919211				\$0.00	0	\$0.00	0	\$0.00	0
RES	919233	Γ			\$0.00	0	\$0.00	0	\$0.00	0
RES	919305	Γ			\$0.00	0	\$0.00	0	\$0.00	0
RES	919365	Γ			\$0.00	0	\$0.00	0	\$0.00	0

Investigation regarding Illinois Bell Section 271 compliance Docket No. 01-0662 Schedule EH-1

Hurter Direct

PUBLIC VERSION

	Invoice Sumi Group Total	nary	\$0.00	0		20	
oice Su	mmary Line		00.08	0	\$0.00	9	_
PU7	UXTBU		\$0.00	0	\$0.00	4	\$0.00
PU7	NRSC		\$0.00	0	\$0.00	0	\$0.00
PU7	NPU		\$0.00	0	\$0.00	1	\$0.00
PU7	N8D		\$0.00	0	\$0.00	2	\$0.00
PU7	ESX		\$0.00	0	\$0.00		\$0.00
RES	999388		\$0.00	0	\$0.00	0	\$0.00
RES	999385		\$0.00	, 0	\$0.00	0	\$0.00
RES	999384		\$0.00	0	\$0.00	0	\$0.00
RES	999383		\$0.00	0	\$0.00	0	\$0.00
RES	999381		\$0.00	0	\$0.00	0	\$0.00
RES	999380		\$0.00	0	\$0.00	0	\$0.00
RES	919377		\$0.00	٧I	\$0.00	٧Į	\$0.00

Summary

Summary Invoice Line: Daily Usage Record Charges

Class of USOC/ Qty/ Service Call Pack Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
DURC @DURC			\$0.00	C	\$0.00	0	_	
Invoice Summary Line Total :	<u>L</u>		\$0.00		\$0.00	1 1	-	
Invoice Summary Group Total :					\$0.00	0		A
Invoice 109695 Total:	<u> </u>							

End of Invoice

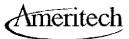
109695

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Schedule EH-1 PUBLIC VERSION

Page 2

# INVOICE ADJUSTMENTS from AMERITECH UNBUNDLED SERVICES



Invoice Number: 109695

**Customer Code:** 

Customer #:

Invoice Date: 2/16/02

**Credits** 

Date Invoice COS USOC Gross Amt. Disc. % Disc. Amt. Adj. Amount Qty Description

**Debits** 

Date Invoice COS USOC Gross Amt. Disc. % Disc. Amt. Adj. Amount Qty Description

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Schedule EH-1 PUBLIC VERSION

# WorldCom Ex 2.0 Hurter Direct Investigation Regarding Illinois Bell Section 271 Compliance Docket No. 01-0662

**Schedule EH-2 Public Version** 

## This schedule contains the following:

Ameritech UNE-P Process Overview.

This schedule contains a total of five (5) pages.

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-2



Date: **August 14, 2001** 

Number: CLECAM01-236

Effective Date: August 18, 2001

Category: UNE-P

Subject: (BILLING) UNE-P RBS to CABS Migration

Related Letters: NA

States Impacted: Ameritech

Response Deadline: NA

Contact: Account Manager

Conference Call/Meeting: NA

#### **UNE-P Existing Process Overview**

Today UNE-P billing is accomplished across two of Ameritech's billing systems, RBS and CABS. The RBS system generates a bill to the Customer for all non-recurring, recurring and usage charges associated with the UNE-P Port. The CABS system generates a bill to the Customer for all non-recurring and recurring charges associated with the UNE-P Loop. This is inconsistent with the other SBC companies where CABS bills both the UNE-P Port and Loop charges.

#### **UNE-P Conversion Overview**

Ameritech will convert the billing of the UNE-P Port charges to CABS and consolidate the UNE-P and UNE-Loop charges on the same bill record. The conversion will provide CABS billing information according to OBF Guidelines as a Type J account. Consistent with SBC implementation, the CABS Type J account will combine the UNE-P Port and Loop billing. The CABS accounts will be established at a LATA level. Usage associated with the UNE-P Port will be billed in CABS at the end office level. Usage associated with Operator Services and Directory Assistance will continue to bill in RBS.

RBS and CABS may not share like billing periods, and this may require the new CABS UNE-P account to carry a new billing period. The new CABS UNE-P billing period will be as close to the existing RBS billing period as possible. These new billing periods also may be different from the current CABS UNE-P Loop billing period.

The new CABS UNE-P accounts will be established in July 2001. These accounts will establish the new Billing Account Number (BAN)-and billing period. These accounts will-initially contain no billing elements. This will result in July 2001 bills being rendered with a zero balance.

Starting August 18, 2001, a conversion process will begin to merge the RBS UNE-P Port account and CABS UNE-P Loop account into a single CABS UNE-P account. This account merger will result in a single CABS bill. The migration will be accomplished by generating individual CABS service orders that will migrate individual RBS

accounts to the proper UNE-P CABS account. The individual service orders will Schedule EH-2 generate fractional charges (OC&Cs) for continuous billing. As the combined billing is implemented, credit OC&Cs will be generated on the CABS Loop account.

RBS will continue to bill Operator Service and Directory Assistance charges. In addition, RBS will bill any unbilled non-recurring charges and fractional OC&Cs from service order activity up to the time of conversion. Any unbilled Shared Transport usage charges that were received by RBS prior to conversion will be billed on the RBS account.

The ordering and provisioning of UNE-P circuits will not be impacted by the conversion. In order to minimize billing errors, CABS billing processing of UNE-P order activity will be held until the conversion is completed. The resultant delay in processing UNE-P service order activity may impact Billing Measurement #17.

We expect the conversion activities to complete by mid-October. All held UNE-P service order activity not already processed will be released at this time. Final bills for the CABS Loop accounts will be issued by end of year 2001.

#### **UNE-P Conversion Timeline**

#### July 1 - 31

- New BAN and bill period information available through the Ameritech Account Management Team.
- New CABS accounts will be established, one per Customer/State/LATA.
- New CABS accounts, once established, will generate zero balance bills.
- New CABS accounts may be established in a different billing period from existing accounts.

#### August 1 - 17

- RBS generates UNE-P bills to the Customer for bill periods August 1<sup>st</sup> through August 13<sup>th</sup>.
- RBS continues to process service order activity and generate recurring, non-recurring and fractional charges (OC&Cs).
- RBS continues to receive Shared Transport usage charges.

#### August 18th

- Conversion migration begins.
- Shared Transport usage charges are sent to CABS rather than RBS.
- UNE-P service order billing activity is held until conversion is complete. (No impact on UNE-P ordering or provisioning).

#### August 19 - 31

- Conversion migration continues.
- RBS UNE-P bills will contain any unbilled non-recurring charges and fractional charges (OC&Cs) generated by UNE-P service order activity and Shared Transport usage charges sent to RBS (last RBS billed period to conversion date).
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only factional charges will continue to be billed).

Schedule EH-2

 The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop charges will start appearing as account information is migrated and combined on a single account).

#### September 1 - 30

- Conversion migration continues.
- RBS UNE-P bills will contain any unbilled non-recurring charges and fractional charges (OC&Cs) generated by UNE-P service order activity and Shared Transport usage charges sent to RBS (last RBS billed period to conversion date).
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only factional charges will continue to be billed).
- The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop charges will start appearing as account information is migrated and combined on a single account).

#### October 1 - 31

- Conversion migration expected to end.
- All held UNE-P service order activity not already processed will be released
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only factional charges will continue to be billed).
- The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop on a single account).
- Normal UNE-P billing Service Order flow begins after held Service Order backlog processes.

#### November 1 - 30

- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts may continue to bill the UNE-P Loop charges.
   (If no clean up required, the accounts will be disconnected and final bills rendered).
- The new CABS UNE-P account will bill UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges.

#### December 1 - 31

- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- All remaining CABS Loop accounts will be disconnected and final bills rendered.
- The new CABS UNE-P account will bill UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges.

The UNE-P Conversion Billing Impact examples illustrate the relationship between the existing CABS UNE-P Loop Accounts, the existing RBS UNE-P Switched Port Accounts,

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and the 'new' combined CABS UNE-P Loop and Switched Port Accounts. The examples are provided for each state for each month of the conversion timeline.

The examples contain columns for each type of Account. A sampling of LATAs for each state has been provided to illustrate the relationship between all 3 Accounts. The first page of each example provides the existing RBS Bill Date and the 'new' combined CABS UNE-P Bill Date, along with significant conversion milestones. Prior to the start of each month the example will contain a notation of any milestone and how this particular milestones will impact each of the 3 types of accounts. These examples show where billing for monthly recurring charges, non-recurring charges, and usage charges for the Port and Loop will appear on a month to month basis during the conversion.

The Local Service Center will continue to serve as the single point of contact for all UNE-P ordering and billing issues.

Ameritech reserves the right to make any modifications to or cancel the above information prior to the effective date. Should any modifications be made to the information, those modifications will be reflected in a subsequent letter. Should the information be canceled, Ameritech will provide additional notification at the time of cancellation. In no event shall Ameritech incur any liability whatsoever to any carrier or other person or party if the information mentioned above is modified or canceled by Ameritech.

Attachment

W Ì

"CABS Migration Bill Mapping IN-IL-MI.do KV ]

"CABS Migration Bill Mapping.doc"

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Schedule EH-3 Public Version

### This schedule contains the following:

Ameritech Tariff: Part 19 - Unbundled Network Elements and Number Portability; Section 7 - Unbundled Directory Assistance Service.

This schedule contains a total of two (2) pages.

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# Ameritech

PART 19

C.C. NO. SECTION 7

PART 19 - Unbundled Network Elements and Number Portability

SECTION 7 - Unbundled Directory Assistance Service

1st Revised Sheet No. 9

1. UNBUNDLED DIRECTORY ASSISTANCE (cont'd)

(N)

#### PRICES (cont'd)

#### Service Elements (cont'd)

		Monthly Payment				
		Term Payment Plans				
Description	1 Month	12 Months	24 Months	36 Months		
Directory Assistance, Term Payment Plan,						

#### Payment Plans

#### Month to Month

The minimum period for the Term Payment Plan is one month, unless otherwise specified. The month-to-month price is subject to Company initiated changes.

(N)

Pursuant to Second Interim Order in Ill. C.C. Docket Nos. 96-0486/0569 Consolidated, dated February 17, 1998.

Issued: April 3, 1998

Effective: April 18, 1998

By D. H. Gebhardt, Vice President - Regulatory Affairs 225 West Randolph Street Chicago, Illinois 60606 WorldCom Ex. 2.0

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# WorldCom Ex 2.0 Hurter Direct Investigation Regarding Illinois Bell Section 271 Compliance Docket No. 01-0662

**Schedule EH-4 Public Version** 

### This schedule contains the following:

Ameritech Tariff: Part 19 - Unbundled Network Elements and Number Portability; Section 8 - Unbundled Operator Services.

This schedule contains a total of two (2) pages.

ILLINOIS BELL TELEPHONE COMPANY

# Ameritech

Tariff

PART 19 SECTION 8

PART 19 - Unbundled Network Elements and Number Portability SECTION 8 - Unbundled Operator Services 2nd Revised Sheet No. 10 Cancels 1st Revised Sheet No. 10

1. UNBUNDLED OPERATOR SERVICES (cont'd)

#### E. PRICES (cont'd)

#### 1. Service Elements

——————————————————————————————————————			
Description	Nonrecurring Charge	Monthly - Price	
Manual Call Assistance, per occurrence	-	.364	(T)
Automated Call Assistance, per occurrence	-	.018	· (T)
Busy Line Verification per occurrence	-	. 936	(T)
Busy Line Verification Interrupt, per occurrence	-	1.094	(T)
Branding, per trunk group <sup>/1/</sup>	299.73	-	(T)

/1/ When branding service is provided on a combined toll and assist Operator Service and Directory Assistance trunk group basis, as technically feasible, a single branding charge will apply. The telecommunications carrier is also responsible for the rates applicable to custom routing, transport and any other services or network elements it orders to deliver its traffic to the Company's switch on separate direct trunks.

Pursuant to Second Interim Order in Ill. C.C. Docket Nos. 96-0486/0569 Consolidated, dated February 17, 1998.

Issued: September 8, 1998

Effective: September 9, 1998

By D. H. Gebhardt, Vice President - Regulatory Affairs

225 West Randolph Street Chicago, Illinois 60606

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